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Attorneys for Defendant
HSUAN BIN CHEN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

HSUAN BIN CHEN, et al.,

Defendant.

Case No. CR-09-00110-SI (MJ)

**DEFENDANT HSUAN BIN CHEN'S
UNOPPOSED APPLICATION AND
[PROPOSED] ORDER FOR TEMPORARY
INTERNATIONAL TRAVEL OUTSIDE THE
NORTHERN DISTRICT OF CALIFORNIA**

Defendant Hsuan Bin Chen hereby requests that this Court permit him to travel outside the Northern District of California, to Hsinchu County, Taiwan. This request is based on the following:

1. On December 20, 2013, Mr. Chen will file with the Court a \$1,000,000 letter of credit to secure his release bond.
2. Mr. Chen wishes to visit family in Taiwan, including his gravely ill father, during the upcoming holidays, including the Chinese New Year.
3. Mr. Chen will travel by air to Taipei, Taiwan on December 23, 2013, and will return to the Northern District of California no later than February 19, 2014. If directed by the Court or otherwise required by case developments before February 19, 2014, Mr. Chen will

1 return immediately. While in Taiwan, he will stay with his wife in the family home, located at
 2 38-1, 4th Lin, Nanpu Tsuen, Beipu Hsian, Hsinchu County, Taiwan.

3 4. Mr. Chen will continue to observe all other terms of his release while in Taiwan.
 4 Through counsel, he will provide the government and his Pretrial Services Officer with his
 5 detailed itinerary.

6 5. In order to facilitate his travel by air consistent with TSA regulations, Mr. Chen
 7 requests that this Court allow him to temporarily have possession of his passport. He will use the
 8 passport to travel to Taiwan and return to the Northern District of California only. Mr. Chen will
 9 return his passport to the custody of Pretrial Services immediately upon his return, no later than
 10 February¹⁹, 2013 (subject only to Pretrial Services' business hours).

11 6. Counsel for Mr. Chen has communicated with Pretrial Services Officer Allen Lew
 12 concerning this request and Mr. Chen's itinerary. Mr. Lew stated that Pretrial Services does not
 13 oppose this request.

14 7. Counsel for Mr. Chen also communicated with Department of Justice attorney
 15 Peter Huston by telephone and email concerning this request. Mr. Huston stated that the
 16 government will not oppose this request.

17 Accordingly, Mr. Chen respectfully requests that the terms of his release bond be
 18 modified temporarily to permit the requested travel.

19 Dated: December 20, 2013

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 JON F. CIESLAK

23 s/ Jon F. Cieslak

24 JON F. CIESLAK

Attorneys for Defendant HSUAN BIN CHEN

ORDER

Based on the foregoing, and good cause appearing, IT IS HEREBY ORDERED that Defendant Hsuan Bin Chen's conditions of release are hereby modified temporarily to permit him to travel outside of the Northern District of California consistent with the terms and conditions set forth above, including the posting of a \$1,000,000 letter of credit to secure his release bond. Mr. Chen may take possession of his passport to permit him to travel as set forth above. Mr. Chen shall immediately return his passport to Pretrial Services when the above-described travel is complete (subject only to Pretrial Services' business hours).

IT IS SO ORDERED.

Dated: December ²⁰, 2013



THE HONORABLE SUSAN ILLSTON
United States District Judge